

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION

IN RE:

CASE NO.: 3:19-bk-04522-JAF  
Chapter 7

ROSECAROL NINA LUNDY,

Debtor.

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**TRUSTEE'S APPLICATION TO EMPLOY  
NAJI HASSAN OF 7 STAR REALTY AS REAL ESTATE AGENT FOR THE ESTATE**

The Application of Aaron R. Cohen, as Trustee, shows:

1. The Estate owns real property located in Marion County, Florida. The Real Estate Agent is being employed to effectuate a sale of the real property.
2. The Trustee desires to employ Naji Hassan to represent and assist the Trustee in selling the property. Naji Hassan's duties will include, *inter alia*, listing the real property for sale, soliciting bids, negotiating with potential buyers, and finalizing the sale.
3. After reviewing the facts of the case, the Trustee has concluded that the assistance of the Real Estate Agent is necessary to enable the Trustee to discharge the Trustee's statutory duties.
4. The Trustee has selected Naji Hassan for the reason that he has the ability and experience to render the necessary assistance, and is familiar with the real estate market in the area where the real property is located.
5. Naji Hassan has agreed to charge his customary fee of eight percent (8%) if the gross sale price of the real property is more than \$50,000.00, and a flat fee of \$3,000.00 if the gross sale of the price of the real property is less than \$50,000.00, payment of which will be

made at closing. The Real Estate Agent further agrees that the reasonableness of the fees and expenses paid shall be determined at a later date by the Court pursuant to §330 of the Bankruptcy Code.

6. To the best of the Trustee's knowledge, neither the Real Estate Agent nor his firm has any connection with creditors of the estate or other parties in interest, their attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee and is thus disinterested within the meaning of 11 U.S.C. §101(14).

/s/ Aaron R. Cohen

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**AARON R. COHEN**  
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Florida Bar I.D. No. 558230  
Chapter 7 Trustee

I CERTIFY that a copy has been furnished by United States Mail on this 19 day of December, 2019 to: Naji Hassan, 9951 Atlantic Boulevard, Suite 130, Jacksonville, FL 32225; Rosecarol Nina Lundy, 10160 SE 69th Ave, Belleview, FL 34420; and by CM/ECF electronic notice to Kenneth M Hesser, Esquire; and the United States Trustee.

/s/ Aaron R. Cohen

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Attorney

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**DECLARATION OF PROPOSED REAL ESTATE AGENT FOR THE ESTATE**

I, Naji Hassan, declare under penalty of perjury pursuant to the provisions of 28 U.S.C. § 1746 that the following statements are true and correct:

1. I am a duly qualified real estate agent, doing business at 7 Star Realty, 9951 Atlantic Boulevard, Suite 130, Jacksonville, Florida 32225.

2. I do not have any interest adverse to the Debtors, the estate, or any creditor or party in interest. I do not have any connections with the Debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee and am thus disinterested within the meaning of 11 U.S.C. § 101(14).

3. I shall agree to charge my customary fee of eight percent (8%) if the gross sales price of the property is more than \$50,000.00 and a flat fee of \$3,000.00 if the gross sale price of the property is less than \$50,000.00, payment of which will be made at closing.



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**NAJI HASSAN**

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7 Star Realty